

Henry Yeung
Development Management
Camden Town Hall
Judd Street
WC1H 9JE

Date: 11th April 2025

Dear Henry,

Objection to Planning Application Reference: 2025/0685/P - Greater London House, Hampstead Road, London, NW1 7QX

We are instructed on behalf of our Client, the British Heart Foundation (hereinafter 'our Client'), to submit representations in relation to planning application ref. 2025/0685/P at Greater London House. We understand the application relates to a non-material amendment to planning permission ref. 2016/4208/P, which has since been built out.

The proposals presented within application ref. 2025/0685/P seek to amend previously approved plans to create external amenity areas around existing lightwells (above the lightwell infills) at the third and fourth floor level at Greater London House, Hampstead Road, London, NW1 7QX ('the Site').

Our Client is, in principle, supportive of the Applicant's efforts to enhance the existing building but raises an objection to the current proposals due to potential impacts on the operation of their business, as outlined below.

Additionally, we request that this letter is considered alongside a separate letter of representation submitted in relation to planning application ref. 2025/0912/P, which seeks to advance additional internal and external works to Greater London House.

We also wish to note that Knight Frank has been instructed to act on behalf of both the British Heart Foundation and ASOS Ltd, who each occupy premises within Greater London House. Separate representations have been submitted on their behalf to address the specific concerns and priorities relevant to each tenant.

Background

The Client

The British Heart Foundation has been a tenant of Greater London House since November 2008, occupying the fourth floor of the building for office use.

The Application

Full planning permission (ref. 2016/4208/P) was granted on 26th October 2016 for:

"The construction of 3 storey infill extensions at upper ground, 1st and 2nd floor levels within the open air atrium of the building to create an additional 3,897m² of office floorspace (B1a); the removal of the existing redundant bridge link structures; associated facilities at lower ground level; the addition of plant at roof level and cycle parking".

The planning permission was granted subject to several conditions, including Conditions 2 and 8. These specific conditions require the development to be carried out in accordance with the approved plans and documents and mandate the submission of full details for the approved roof plan during the development process.

On 14th February 2025, Lazari Properties 3 Limited submitted a planning application to amend the wording of planning conditions 2 and 8 and amending floor plans which were previously approved. The updated proposals seek to provide outdoor amenity areas within the existing lightwells (above the recent lightwell infills) at third and fourth floor levels. The description of development as follows:

"Non-material amendment to planning permission 2016/4208/P, granted on 26/10/2016, for "The construction of three-storey infill extensions at upper ground, first, and second-floor levels within the open-air atrium of the building to create an additional 3,897m² of office floorspace (B1a); the removal of the existing redundant bridge link structures; associated facilities at lower ground level; the addition of plant at roof level; and cycle parking," namely, the removal and repositioning of the green roof and the existing solar panels".

Our Client has not been consulted regarding the proposed works prior to the submission of this planning application. Consequently, there has been a distinct lack of meaningful engagement, leaving our Client inadequately informed, unclear about the potential impacts on their operations and unable to provide any constructive input into the final design.

Objections

Visual Intrusion and Privacy Impact

We understand the proposals would result in the creation of external amenity spaces located around the existing north and south lightwells (as detailed below), which are situated either below or adjacent to our Client's offices and meeting spaces.

Third Floor

Four amenity areas at third-floor level will be created, with access to each terrace via new doorways formed in neighbouring window bays. Terraces will be higher than the interior floor level and each access point from neighbouring office demises will feature an internal platform with steps and a stair riser type wheelchair platform lift.

Amenity spaces will be enclosed with balcony railings and 'Jali' screens to maintain separation from the central skylights. Planters are also proposed to be placed at various points along the balcony railing to provide screening to the lightwells.

Fourth Floor

Four elevated paved terrace areas will be created at fourth-floor level, with level access taken from neighbouring office demises via new doorways formed in neighbouring window bays.

The fourth-floor terraces are proposed to be sited on elevated painted steel frames bearing directly onto the existing lightwell infill structural frame grid. Perimeter balcony railings and 'Jali' screens to enclose the terraces and planters are again proposed along the balcony railings.

While it is acknowledged that the proposed development includes measures such as balcony railings, 'Jali' screens and planting to address privacy concerns, our Client remains concerned that these provisions are insufficient to mitigate the impact of overlooking and visual intrusion to spaces they currently occupy.

Given our Client's existing use of the space at the fourth floor to conduct meetings and share confidential information with their staff, it is anticipated that the development, as proposed, would result in direct overlooking into these areas at the fourth floor level.

Furthermore, our Client expresses significant concern regarding the potential noise impact on their office spaces, arising from the use of these terraces by building occupants directly adjacent to and below the current office areas.

Consequently, our Client may be forced to modify their operations significantly, which would have a considerable and detrimental impact on their business.

Lack of Engagement

Paragraph 131 of the National Planning Policy Framework ('NPPF') emphasises that the creation of high-quality, beautiful, and sustainable buildings is fundamental to the planning and development process. It highlights that good design is a key aspect of sustainable development, creating better places to live and work and making development more acceptable to communities. Policy stresses that clear design expectations and effective engagement between applicants, communities, local planning authorities and other stakeholders throughout the process are essential for achieving these outcomes.

Furthermore Paragraph 137 explains that design quality should be considered throughout the evolution of proposals. It is noted that early engagement between applicants, the local planning authority and the local community about the design and style of emerging schemes is essential to align expectations and balance local and commercial interests. Policy also notes that applicants must also work closely with those affected by their proposals to ensure that the designs evolve in response to community feedback.

Our Client has not been consulted regarding the proposed works prior to the submission of this planning application. As such, there has been a clear lack of meaningful engagement, leaving our Client uninformed, unclear of the potential impacts to their operations and unable to provide input on the final design. The design of the proposed development has a direct impact on the Client's use of the premises, and the absence of any meaningful consultation with the Client undermines the design process, especially considering the potential operational disruptions and concerns that could have been addressed through early engagement.

Given this lack of consultation prior to submission of Application Ref. 2025/0685/P, it is evident effective stakeholder involvement has not been undertaken in the design process in accordance with requirements set out in the NPPF.

Summary

As stated above, our Client is, in principle, supportive of the Applicant's efforts to enhance the existing building. However, there is potential for the proposals to detrimentally impact our Client's business operations at the Site. As required by the NPPF, effective engagement to ensure good design and align expectations is essential and we do not consider that this application has sufficiently satisfied this requirement.

We therefore request that this application be assessed with full consideration of its potential impacts upon the British Heart Foundation, as an operational tenant of the building. Additionally, we would request an opportunity for the British Heart Foundation to review the final application prior to its determination, ensuring that all concerns are adequately addressed.

Specifically, we ask that the plans be amended to address the concerns raised before the application is determined. Alternatively, if amendments are not possible, we request that relevant additional details be approved by way of condition attached to the planning permission if granted.

As noted previously, Knight Frank have been instructed to act on behalf of both the British Heart Foundation and ASOS Ltd, who each occupy premises within Greater London House. Separate representations have been submitted on their behalf to address the specific concerns and priorities relevant to each tenant.

Please do not hesitate to contact myself or my colleague Niki Walia
the above further.

if you would like to discuss

Yours sincerely,

Sarah Hiscutt
Partner